

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA  
WESTERN DIVISION

UNITED STATES OF AMERICA

v.

KENYALE DEJUAN BAILEY,  
a/k/a “FUJI;”  
DEANTE DEMARCO RAMBUS,  
a/k/a “K.P.;”  
CHRISTOPHER ANTWAN WARE;  
TYE DONNAILE CHANDLER;  
DYRRIC DUNBAR, a/k/a “DUNN;”  
VICTOR NICHOLAS WAKEFIELD,  
a/k/a “VIC;”  
BRANDON GLEN KEY, a/k/a “KEYS,”  
a/k/a “KOKANE KEYS;”  
KENDALL FREDERICK DENZELL  
HOSENDOVE; and  
NATASHA LARAE YOUNGBIRD

**INDICTMENT**

Case No. \_\_\_\_\_

Violations: 21 U.S.C. §§ 841(a)(1),  
841(b)(1)(C), 846, and 853; and 18  
U.S.C. §§ 2 and 924(c)(1)(A)

**COUNT ONE**

**Conspiracy to Distribute and Possess with Intent to Distribute Oxycodone**

The Grand Jury Charges:

Beginning in or about 2011 and continuing until the date of this Indictment, in the District of North Dakota, and elsewhere,

KENYALE DEJUAN BAILEY, a/k/a “FUJI;”  
DEANTE DEMARCO RAMBUS, a/k/a “K.P.;”  
CHRISTOPHER ANTWAN WARE;  
TYE DONNAILE CHANDLER;  
DYRRIC ROMEL DUNBAR, a/k/a “DUNN;”  
VICTOR NICHOLAS WAKEFIELD, a/k/a “VIC;”  
BRANDON GLEN KEY, a/k/a “KEYS,” a/k/a “KOKANE KEYS;”  
KENDALL FREDERICK DENZELL HOSENDOVE; and  
NATASHA LARAE YOUNGBIRD

knowingly and intentionally combined, conspired, confederated, and agreed together and with others, both known and unknown to the grand jury, to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the conspirators committed the following overt acts:

1. It was a part of said conspiracy that the defendants and others would and did distribute, and possess with intent to distribute, pills containing a detectable amount of oxycodone, a Schedule II controlled substance, in Bismarck, North Dakota; Minot, North Dakota; New Town, North Dakota; and elsewhere;
2. It was further a part of said conspiracy that the defendants and others would and did attempt to conceal their activities;
3. It was further a part of said conspiracy that the defendants and others would and did use United States currency in their drug transactions;
4. It was further a part of said conspiracy that the defendants and others would and did use telecommunication facilities, including cellular telephones, to facilitate the distribution of controlled substances;

5. It was further a part of said conspiracy that one or more conspirators traveled by train, airline, automobile, and other means of transportation between, and within, Michigan and North Dakota, and elsewhere, to obtain and distribute pills containing oxycodone, and to transport the proceeds from distribution activity;
6. It was further a part of said conspiracy that one or more conspirators utilized apartments, hotels, and residences in Bismarck, North Dakota; Minot, North Dakota; New Town, North Dakota, and elsewhere, to possess, store, conceal, and distribute pills containing oxycodone, and to possess, store, and conceal proceeds of pill distribution activity; and
7. It was further a part of said conspiracy that one or more conspirators collected money from other persons to purchase pills containing oxycodone;

In violation of Title 21, United States Code, Section 846; Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT TWO

**Distribution of Oxycodone**

The Grand Jury Further Charges:

Beginning in or about 2011 and continuing until the date of this Indictment, in the District of North Dakota, and elsewhere,

KENYALE DEJUAN BAILEY, a/k/a “FUJI;”  
DEANTE DEMARCO RAMBUS, a/k/a “K.P.;”  
CHRISTOPHER ANTWAN WARE;  
TYE DONNAILE CHANDLER;  
DYRRIC ROMEL DUNBAR, a/k/a “DUNN;”  
VICTOR NICHOLAS WAKEFIELD, a/k/a “VIC;”  
BRANDON GLEN KEY, a/k/a “KEYS,” a/k/a “KOKANE KEYS;”  
KENDALL FREDERICK DENZELL HOSENDOVE; and  
NATASHA LARAE YOUNGBIRD,

individually, and by aiding and abetting, knowingly and intentionally distributed a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT THREE

**Possession of Oxycodone with Intent to Distribute**

The Grand Jury Further Charges:

On or about October 14, 2016, in the District of North Dakota, and elsewhere,

DEANTE DEMARCO RAMBUS, a/k/a “K.P.,” and  
TYE DONNAILE CHANDLER,

individually, and by aiding and abetting, knowingly and intentionally possessed with intent to distribute approximately 227 pills containing a detectable amount of oxycodone, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FOUR

**Possession of Oxycodone with Intent to Distribute**

The Grand Jury Further Charges:

On or about October 14, 2016, in the District of North Dakota, and elsewhere,

CHRISTOPHER ANTWAN WARE,

individually, and by aiding and abetting, knowingly and intentionally possessed with intent to distribute approximately 153 pills containing a detectable amount of oxycodone, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FIVE

**Possession of a Firearm in Furtherance of a Drug Trafficking Crime**

The Grand Jury Further Charges:

On or about October 14, 2016, in the District of North Dakota, and elsewhere,

DEANTE DEMARCO RAMBUS, a/k/a “K.P.,”

during and in relation to a drug trafficking crime for which DEANTE DEMARCO

RAMBUS, a/k/a “K.P.,” may be prosecuted in a court of the United States, namely,

(i) Conspiracy to Distribute and Possess with Intent to Distribute Oxycodone, as alleged in Count One of this Indictment; (ii) Distribution of Oxycodone, as alleged in Count Two of this Indictment; and (iii) Possession of Oxycodone with Intent to Distribute, as alleged in Count Three of this Indictment, possessed a firearm, namely, one Glock, Model 19 Gen 4, 9mm pistol, serial number ACBF516;

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

FORFEITURE ALLEGATION

The Grand Jury Further Find Probable Cause That:

As a result of committing one or more of the controlled substance offenses alleged in Counts One, Two, Three, and/or Four of this Indictment,

KENYALE DEJUAN BAILEY, a/k/a “FUJI;”  
DEANTE DEMARCO RAMBUS, a/k/a “K.P.;”  
CHRISTOPHER ANTWAN WARE;  
TYE DONNAILE CHANDLER;  
DYRRIC ROMEL DUNBAR, a/k/a “DUNN;”  
VICTOR NICHOLAS WAKEFIELD, a/k/a “VIC;”  
BRANDON GLEN KEY, a/k/a “KEYS,” a/k/a “KOKANE KEYS;”  
KENDALL FREDERICK DENZELL HOSENDOVE; and  
NATASHA LARAE YOUNGBIRD,

shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the violations and any and all property used or intended to be used in any manner or part to commit or to facilitate the commission of the violations alleged in Counts One, Two, Three, and/or Four of this Indictment, including but not limited to the following:

A sum of money representing the amount of gross proceeds derived and obtained as a result of the offenses alleged in Counts One, Two, Three, and/or Four of this Indictment.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred to, sold to, or deposited with a third person;

- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of KENYALE DEJUAN BAILEY, a/k/a “FUJI;” DEANTE DEMARCO RAMBUS, a/k/a “K.P.;” CHRISTOPHER ANTWAN WARE; TYE DONNAILE CHANDLER; DYRRIC ROMEL DUNBAR, a/k/a “DUNN;” VICTOR NICHOLAS WAKEFIELD, a/k/a “VIC;” BRANDON GLEN KEY, a/k/a “KEYS,” a/k/a “KOKANE KEYS;” KENDALL FREDERICK DENZEL HOSENDOVE; and, NATASHA LARAE YOUNGBIRD, up to the value of the above-listed forfeitable property;

In violation of Title 21, United States Code, Section 853.

A TRUE BILL:

/s/ Grand Jury Foreperson  
Foreperson

/s/ Christopher C. Myers  
CHRISTOPHER C. MYERS  
United States Attorney

RLV/am